

REMARKS

Applicant respectfully disagrees with the Examiner's rejection and requests that the Examiner withdraw the rejection based on the following arguments.

The Examiner should withdraw the section 103(a) rejection of claims 1-23 because, first, the prior art does not make obvious the invention as claimed because it neither teaches nor suggests every limitation of the inventions claimed in those claims. Second, there is no suggestion or motivation to combine the teachings of the cited references. To support a section 103(a) rejection, "the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP § 706.02(j). In addition, "there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings." Id. "The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done." Id. For the following reasons, applicant submits that the Examiner has not met this burden.

First, the prior art references cited by the Examiner do not contain all of the limitations claimed in claims 1-23. Independent claims 1, 11, and 18 require the limitation of a steering wheel with a closed face. The written description defines "closed face" in this context as "an integral structural feature of the hub 53 and not a face closed by a cap or cover, and in particular such that closed face 58 in combination with spokes 52 may present a smooth, seamless surface." P. 7, lns. 8-10. Henigue does not disclose any face at all, and Lambert discloses a face closed by a cap or cover. (See Figs. 1, 3-5, 7-10). The closed face of the present invention simply is not found in the cited prior art, and this closed face is an important feature of the present invention for several reasons. First, the integral face is aesthetically pleasing and therefore is a highly desired feature in luxury vessels. Second, since the face is integral with the steering wheel,

water, especially highly corrosive salt water, will not leak through the face of the steering wheel and corrode the steering column connection assembly. Finally, without a closed face the steering column connection assembly of the present invention is not needed. One could simply remove a face plate or cap and connect the steering wheel to the steering column as in Lambert, for example. By contrast, under the present invention, no tools and no disassembly are required to tighten the steering column connection assembly. As a result, the closed face in the present invention is an important and novel feature, and nothing in the prior art makes obvious this aspect of the present invention.

In addition, independent claims 1, 11, and 18 require that the tightening nut be joined to the hub of the steering wheel, which is another limitation not found in the prior art. In the last sentence on the second page of the Office Action, the Examiner incorrectly states that Henigue discloses a tightening nut “joined to said hub of said steering wheel.” The figure in Henigue clearly depicts a tightening nut (11) that joins via threading (12) to the coupling member (9). Thus, in Henigue, the tightening nut (11) abuts to the hub (4), but the two are not joined in any way. In addition, Lambert does not disclose any tightening nuts disposed about the shaft, and thus cannot anticipate this limitation of the present invention.

Claims 1, 11, and 18 are the only independent claims in the present invention. Since the prior art cited by the Examiner does not contain all of the limitations required by these claims, they should be allowed along with the claims that depend from them.

Furthermore, claims 6, 7, 11, 15, 16, and 18-23 require a hub anti-rotation means for precluding relative independent rotational movement between the hub and the coupling member. “Preclude” means “to make impossible, especially in advance.” *Webster’s New World College Dictionary*, 4th ed. (2002). Henigue discloses threading (10) between the hub (4) and the

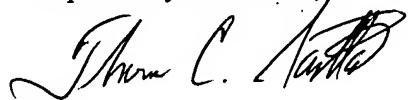
coupling member (9). However, threading does not preclude rotation, but rather promotes it. There is no disclosure in Henigue that shows that the threading (10) prevents, or is intended to prevent, independent rotation between the hub and the coupling member. Moreover, Lambert specifically discloses a flexible connection between the hub and coupling member by means of an elastic, yielding member (5). Thus, Lambert teaches away from the present invention because the invention in Lambert is specifically designed to permit rotation between the hub and coupling member.

In sum, claims 6, 7, 11, 15, 16, and 18-23 require structural limitations not disclosed in the prior art cited by the Examiner. Consequently, these claims are patentably distinct over the prior art and should be allowed.

Additionally, in making a section 103(a) rejection, the Examiner must specify a suggestion or motivation in the prior art references to combine their teachings. The Examiner failed to do so in the first Office Action. Since the Applicant cannot find a suggestion or motivation in the cited prior art patents to combine their teachings, the Applicant respectfully requests that the Examiner specifically cite such suggestion or motivation. This step is of greater importance where, as here, the prior art teaches away from the present invention.

Applicant respectfully submits that all the claims as presented are patentable, on the basis of the above remarks, and reconsideration and subsequent passage for allowance is hereby requested.

Respectfully submitted,



Thomas C. Saitta, Reg. No. 32102
Attorney for Applicant

Rogers Towers, P.A.
1301 Riverplace Blvd.
Suite 1500
Jacksonville, FL 32207
904-346-5518
904-396-0663 (fax)